

EXHIBIT 16

1 Pusachev
2 ever use Dragon or a dictation device
3 along the lines of what I described?

4 A. I don't remember installing such
5 software for anybody, I don't remember.

6 Q. Have you ever heard of a
7 computer program called JAWS, J-A-W-S?

8 A. No.

9 Q. NO?

10 A. First time hearing.

11 Q. Yes. Did you ever communicate
12 with Ms. Ruderman about installing any
13 kind of computer program on her work
14 computer?

15 A. No.

16 Q. Did you ever communicate with
17 anybody at the firm about installing or
18 potentially installing a computer program
19 on Ms. Ruderman's computer?

20 A. I don't remember that.

21 Q. Did Irene Raskin ever ask you to
22 increase the font size on Ms. Ruderman's
23 computer?

24 A I don't remember

25 Q. Do you recall ever in fact

1 Pusachev
2 increasing the font size on Ms. Ruderman's
3 computer?

4 A. I don't remember. I don't
5 remember doing so, so.

6 Q. Did you ever -- so you have no
7 recollection of increasing the font size
8 on Ms. Ruderman's computer?

9 A. I don't recall it, no.

10 Q. Right. And you have no
11 recollection of speaking to Ms. Raskin
12 about increasing the font size on Ms.
13 Ruderman's computer?

14 A. I don't remember.

15 Q. Did you ever communicate with
16 Ms. Ruderman about a device called OrCam?

17 A. Can you repeat the device?

18 Q. Sure, it's OrCam, O-R-C-A-M.
19 You've never heard of such a device?

20 A. No, first I'm hearing that.

21 O. Have you ever heard of any

22 of glasses that are specifically designed
23 to assist the blind or people with severe
24 vision impairments?

25 A. I don't recall it. Probably